

KOLESAR & LEATHAM

400 S. Rampart Blvd., Ste. 400

Las Vegas, Nevada 89145

Tel: (702) 362-7800 / Fax: (702) 362-9472

MICHAEL R. BROOKS, ESQ.
Nevada Bar No. 007287
SCOTT D. FLEMING, ESQ.
Nevada Bar No. 005638
KOLESAR & LEATHAM
400 S. Rampart Blvd., Ste. 400
Las Vegas, Nevada 89145
Telephone: (702) 362-7800
Facsimile: (702) 362-9472
E-Mail: mbrooks@klnevada.com
sfleming@klnevada.com

Attorneys for Creditor
BRILENA, INC.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

IN RE:

SONIA C. LOPEZ,

Debtor(s).

Case No. BK-S-15-14086-mkn

Chapter 13

EX PARTE DECLARATION OF NON-CURE OF MICHAEL R. BROOKS, ESQ.

I, Michael R. Brooks, Esq., declare as follows:

1. I am an attorney at law, duly licensed by all the Courts of the state of Nevada.

2. I have personal knowledge of the facts set forth below and if called upon to testify thereto, I could and would do so truthfully and competently.

3. On November 4, 2016, this Court entered an Order on Amended Stipulation Granting Adequate Protection Re Real Property Located at 819 North Divisadero Street, Visalia, California 93291 (the "Stipulated APO"). A true and correct copy of the Stipulated APO is attached hereto as Exhibit "1."

4. Paragraph 4) of the Stipulated APO requires debtor, Sonia Lopez, to maintain all payments for property taxes and insurance for the subject property.

5. Payments for property taxes and insurance are delinquent for the period from 2014 to present. Moreover, the borrower has not provided any proof of insurance.

1 6. Pursuant to paragraph 6 of the Stipulated APO, in the event of a default, Notice of
2 the Default would be sent to the Debtor and Debtor's attorney.

3 7. On or about June 20, 2018, I caused Notice of Default to be served on Debtor's
4 Counsel and Debtor, Sonia Lopez, 2410 Swifton Court, Las Vegas, Nevada 89104.

5 8. As of today's date, the Debtor has not cured the default and movant is entitled to
6 relief from the automatic stay.

7 9. I declare under penalty of perjury that to the best of my knowledge, the foregoing
8 is true and correct.

9 DATED this 28 day of July 2018.

10
11 By: 

12 MICHAEL R. BROOKS, ESQ.
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KOLESAR & LEATHAM

400 S. Rampart Blvd., Ste. 400

Las Vegas, Nevada 89145

Tel: (702) 362-7800 / Fax: (702) 362-9472